

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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ARIELLE FLETCHER,

Plaintiff,

-against-

Case No. 20-cv-03413 (KSH)(CLW)

GATEWAY GROUP ONE, BENJAMIN OKOLI,  
STATE OF NEW JERSEY, COUNTY OF ESSEX,  
CITY OF NEWARK, CITY OF ELIZABETH,  
EMERSON RUSSELL, MAINTENANCE COMPANY  
AVIATION, PORT AUTHORITY OF NEW YORK  
AND NEW JERSEY,

**NOTICE OF MOTION TO DISMISS  
THE AMENDED COMPLAINT**

Defendants,

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To: Joseph Rakofsky, Esq.  
Injury & Accident Law Rakofsky, LLC  
*Attorneys for Plaintiff*  
P.O. Box 32250  
Newark, New Jersey 07102  
(via ECF)

**PLEASE TAKE NOTICE**, that defendant the Port Authority of New York and New Jersey, through its counsel the Port Authority Law Department, shall move before the Honorable Katharine S. Hayden, on March 10, 2021, at 9:00 a.m. for an order dismissing the amended complaint.

**PLEASE TAKE FURTHER NOTICE**, that defendant shall rely upon the enclosed supporting memorandum of law, the certification of counsel and the pleadings previously filed in this action.

**PLEASE TAKE FURTHER NOTICE**, that a proposed form of Order is attached.

Dated: January 29, 2021

PORT AUTHORITY LAW DEPARTMENT  
*Attorneys for Defendant*  
Port Authority of New York and New Jersey

By: /s/ Megan Lee

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